This is to register the strongest possible opposition to the adoption of BPL. Numerous experiments demonstrate the susceptibility of safety, public service, aeronautical, marine, and amateur radio services to disastrous interference.

Existing FCC rules would never permit the leakage of this amount of RF energy from a cable TV system. Why should it be permitted for BPL? Power transmission lines are NOT designed to serve as balanced or shielded transmission lines. Is it wise for the Commission to set a precedent that international shortwave broadcasts, amateur, marine and aircraft communications are afforded less protection than AM or FM broadcast? The Commission should also ask who would best be served by BPL. Almost all telco and cable services are already offering some form of broadband connection in a form which radiates little or no interference. I have several other concerns as a licensed amateur operator, GROP license holder and broadcast engineer. If HF communications become impossible at my location as a result of BPL interference, what recourse will I have? Will the BPL provider have to cease and desist? Operators of part 15 equipment must cease operation if interference is caused to licensed communications, even licensed services and broadcast stations must take steps to correct interference caused to other services. I do not believe that BPL operators should be exempt form this requirement, or that BPL operation should be approved in any form that has the potential to cause serious interference of any kind to existing services.

I have read of tests which indicate that even low power amateur communication in the 80-20 meter bands can disrupt BPL connections for several city blocks, 300 watt signals can do so for up to half a mile, and full legal limit 1500 watt pep for even greater distances . What protection will I be afforded if I disrupt broadband connections while operating an amateur station, as I am legally entitled to do under the terms of my license?

Although BPL frequencies are outside of the AM broadcast band, have adequate tests been performed to assure that no intermod, reradiated or otherwise mixed byproducts will interfere with AM broadcast service? AM service is already degraded by power line noise and by the broad-spectrum noise emitted by almost all computing devices.

Respectfully submitted,
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